



THE CITY OF NEW YORK
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February 22, 2017

BY ECF

Honorable William H. Pauley III
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Jasmine Bridgeforth, et al. v. City of New York, et al.
16-CV-273 (WHP) (RLE)

Your Honor:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to represent Defendants City of New York, Detective John Zerafa, Police Officer Rafael Sanchez, Police Officer Mohammed Khang, Sergeant Demetrious Lee, and Mr. Luis Despaigne (hereinafter collectively "Defendants"). Defendants write, with Plaintiff's consent, to request a brief forty-five (45) day extension of time to April 14, 2017, in order to conduct fact discovery for the reasons set forth herein. Fact discovery presently closes on February 28, 2017. Upon information and belief, this extension should not affect any other deadlines.

The primary reason for making this request is that the above-referenced matter was recently transferred to the undersigned from the Assistant Corporation Counsel previously assigned to this matter. In light of this recent transfer, the undersigned humbly requests additional time to become familiar with the matter and time to meet with the individually named defendants in anticipation of upcoming depositions. During this period of administrative transition, the parties have already met and conferred multiple times in the past week, and are working cooperatively to develop a workable plan for the completion of fact discovery within the proposed extension of time. The parties have undertaken effort to confer regarding the scheduling, availability and order of production of parties and witnesses for deposition.

Plaintiff's counsel has also advised the undersigned that, on February 14, 2017, his application requesting access to the records of two non-party arrestees in the above-referenced matter was granted by the Honorable Larry Stephen of the New York County Supreme Court. The parties respectfully request a brief extension of time so that they may exchange such forthcoming paper discovery.

Plaintiff has also advised the undersigned that the parties have made meaningful progress with respect to the collection of additional family court and search warrant application transcripts. As the Court is aware, it ordered production of the search warrant application in the above-referenced matter in December 2016, which led to additional information regarding the oral application minutes.

Accordingly, the parties respectfully request that the deadline for fact discovery be extended to April 14, 2017.

Defendants thank the Court for its consideration of this application.

Respectfully submitted,

/s/

Elizabeth Bardauskis
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Ryan Lozar, Esq. (Via ECF)
Attorney for Plaintiff